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Attorneys for Plaintiffs

Defendants' Counsel Listed on the Next Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JERMAINE HAYNES, CORNELIUS CLARK, CHESTER LEWIS, DAVID MCFARLIN II, JOHN PONDS, AND GARRANT COSEY, on behalf of themselves and all other persons similarly situated,

CLASS ACTION

Case No. C05-02670-MMC

**STIPULATION AND [PROPOSED] ORDER
REGARDING CLASS CERTIFICATION
DISCOVERY AND BRIEFING
SCHEDULES**

Hon. Maxine M. Chesney

Plaintiffs,

vs.

ANNA'S LINENS, ALAN GLADSTONE and CARIE GLADSTONE DOLL

Defendants

1 MICHAEL T. LUCEY (SB # 9927)
2 MICHAEL D. BRUNO (SB # 166805)
3 BRIAN D. MASCHLER (SB # 111824)
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10 Attorneys for Defendants
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STIPULATION

Plaintiffs Jermaine Haynes, Cornelius Clark, Chester Lewis, David McFarlin II, John Ponds, and Garrant Cosey (“Plaintiffs”) and Defendants Anna’s Linens, Inc. (“Anna’s Linens”), Alan Gladstone and Carie Gladstone Doll (“Defendants”), by and through their counsel of record, hereby stipulate as follows:

1. At the Case Management Conference on November 4, 2005, the Court set July 28, 2006 as the deadline for plaintiffs to file their motion for class certification.

2. Counsel for the parties represented to the Court that they would try and reach agreement on schedules for class certification discovery and briefing.

3. The Court set November 18, 2005 as the date for the parties to submit their proposed class certification discovery and briefing schedules to the Court.

NOW, THEREFORE, the parties additionally stipulate and request, through their counsel of record, that the Court approve and adopt the schedules for class certification discovery and briefing as set forth below:

Non-Expert Discovery Schedule

Complete non-expert interrogatories and document discovery by	6/30/06
Complete non-expert depositions (<i>e.g.</i> , Parties, Fed.R.Civ.P. 30(b)(6) deponents, witnesses and records custodians) by	6/30/06

Expert Discovery and Reports

Plaintiffs to provide Fed.R.Civ.P. 26(a)(2) expert disclosures by	5/5/06
Plaintiffs' expert(s) to be made available for deposition by	5/19/06
Defendants to provide Fed.R.Civ.P. 26(a)(2) expert disclosures by	6/9/06
Defendants' expert(s) to be made available for deposition by	6/23/06
Plaintiffs to serve rebuttal expert reports by	7/7/06
Defendant to serve supplemental expert reports by	7/21/06
Expert discovery cut-off	7/21/06

1 **Class Certification Briefing Schedule**

2 Motion for Class Certification to be filed by 7/28/06
3 Defendants' Opposition to Class Certification to be filed by 8/25/06
4 Plaintiffs' Reply to be filed by 9/8/06
5 Hearing on Motion for Class Certification (on or after) 9/22/06

6 SO STIPULATED.

7 Dated: November 18, 2005

8 Respectfully submitted,

9 /s/

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18 ATTORNEYS FOR PLAINTIFFS

1 November 18, 2005

2
3 /s/
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12 CROSS-COMPLAINANT ANNA'S LINENS, INC.

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ORDER

The Court has considered the above Stipulation, and good cause appearing therefor, the Court hereby ORDERS the following deadlines for class certification discovery and briefing:

Non-Expert Discovery Schedule

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IT IS SO ORDERED.

DATED: November 18, 2005

Maxine M. Chesney
THE HONORABLE MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE